

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**WSOU INVESTMENTS, LLC D/B/A  
BRAZOS LICENSING AND  
DEVELOPMENT,**

**Plaintiff,**

**v.**

**DELL TECHNOLOGIES INC., DELL  
INC., EMC CORPORATION, AND  
VMWARE, INC.,**

**Defendants.**

§ **CIVIL ACTION 6:20-CV-00473-ADA**  
 § **CIVIL ACTION 6:20-CV-00474-ADA**  
 § **CIVIL ACTION 6:20-CV-00475-ADA**  
 § **CIVIL ACTION 6:20-CV-00476-ADA**  
 § **CIVIL ACTION 6:20-CV-00477-ADA**  
 § **CIVIL ACTION 6:20-CV-00478-ADA**  
 § **CIVIL ACTION 6:20-CV-00479-ADA**  
 § **CIVIL ACTION 6:20-CV-00480-ADA**  
 § **CIVIL ACTION 6:20-CV-00481-ADA**  
 § **CIVIL ACTION 6:20-CV-00482-ADA**  
 § **CIVIL ACTION 6:20-CV-00485-ADA**  
 § **CIVIL ACTION 6:20-CV-00486-ADA**  
 §  
 § **PATENT CASE**  
 §  
 § **JURY TRIAL DEMANDED**

**NOTICE OF COMPLIANCE**

Plaintiff WSOU Investments, LLC d/b/a Brazos License and Development ( “Plaintiff”) hereby notifies the Court that Defendants have complied with the Court’s February 5, 2021 to limit the claim terms in above cases to the thirty-six (36) for the four grpus of patents. Those terms are identified in Exhibit A.

The parties also have agreed to maintain the overall OGP 3.2 limits for the four groups of patents, but shift the terms and pages as follows:

Group	Terms	Opening/Response	Reply/Sur-reply
Group 1 (4 patents) ‘133 Patent, ‘800 Patent, ‘309 Patent, and ‘360 Patent	15	36	19
Group 2 (2 patents) ‘144 Patent and ‘921 Patent	4	13	6
Group 3 (2 patents) ‘489 Patent and ‘020 Patent	4	13	5

Group	Terms	Opening/Response	Reply/Sur-reply
Group 4 (4 patents) '435 Patent, '536 Patent, '888 Patent, and '129 Patent	13	38	20

Dated: February 12, 2021

Respectfully submitted,

By: /s/ Ryan S. Loveless

James L. Etheridge

Texas Bar No. 24059147

Ryan S. Loveless

Texas Bar No. 24036997

Brett A. Mangrum

Texas Bar No. 24065671

Travis L. Richins

Texas Bar No. 24061296

Jeff Huang

Etheridge Law Group, PLLC

2600 E. Southlake Blvd., Suite 120 / 324

Southlake, TX 76092

Tel.: (817) 470-7249

Fax: (817) 887-5950

Jim@EtheridgeLaw.com

Ryan@EtheridgeLaw.com

Brett@EtheridgeLaw.com

Travis@EtheridgeLaw.com

Jeff@EtheridgeLaw.com

Mark D. Siegmund

State Bar No. 24117055

mark@waltfairpllc.com

Law Firm of Walt, Fair PLLC.

1508 North Valley Mills Drive

Waco, Texas 76710

Telephone: (254) 772-6400

Facsimile: (254) 772-6432

*Counsel for Plaintiff WSOU Investments, LLC*

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing instrument was served or delivered electronically to all counsel of record, on this the 12th day of February, 2021.

/s/ Ryan S. Loveless  
Ryan S. Loveless